

KIRBY McINERNEY LLP

USDC SDNY	25 Third Avenue
DOCUMENT	New York, NY 10022
ELECTRONICALLY FILED	
DOC #:	212.371.6600
DATE FILED: <u>11/27/13</u>	Fax. 212.751.2540
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November 21, 2013

Of counsel

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3219 Edith Street  
Laval, Quebec H7P 5M2  
Canada

*Docket & file*  
*07 Civ. 9901 (SAS)*

Re: *In re Citigroup Inc. Securities Litigation* (Claim number 2587229)

Dear Mr. Atallah:

Thank you for your letter dated November 5, 2013. We have reviewed your proof of claim form dated February 6, 2013. As noted in the Court-approved Notice, “each Claim Form must state and provide sufficient documentation for each Claimant’s transactions in Citigroup common stock during the Class Period.” In completing the schedules of transactions requested under Part III of the claim form, the instructions in the claim form further state that you must “separately list each purchase or acquisition and sale of Citigroup common stock” and “all purchases or acquisitions and sales of Citigroup common stock requested in this Proof of Claim and Release form must be documented by brokerage statements, confirmations or similar documents.”

The schedule of transactions in your claim form does not comply with the instructions. The beginning holdings information is not provided; purchases or acquisitions are not listed; sales are not listed; and ending holdings are not provided. Instead, you have written, “Please see attached receipts.” According to your letter, the attached receipts are “Quebec provincial and Canadian federal tax forms within the Class Period reflecting stock option deductions to purchase Citigroup Inc. Common Stock.”

However, the tax documentation you have provided is not sufficient to establish membership in the Settlement Class. Without the beginning holdings information, specific purchase and sale information, and ending holdings information, it is not possible to calculate any Recognized Losses you may have under the Court-approved plan of allocation.

You may still submit the appropriate documentation and necessary information to reflect eligible purchases during the Class Period. Please note that the documentation will need to show: (1) beginning holdings of Citigroup common stock held at the beginning of trading on February 26, 2007; (2) purchases or acquisitions of Citigroup common stock during the period February 26, 2007 to July 17, 2008, inclusive, including the trade date, number of shares purchased or acquired, purchase or acquisition price per share, net purchase or acquisition price (less commissions and fees); (3) sales of Citigroup common stock during the period February 26, 2007 to July 17, 2008, inclusive, including the trade date, number of shares sold, sale price per

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share, and net sale price; and (4) ending holdings of Citigroup common stock held at the close of trading on July 17, 2008. You may submit this information to the claims administrator at the below address:

*In re Citigroup Inc. Securities Litigation*  
c/o GCG  
P.O. Box 9899  
Dublin, Ohio 43017-5799

Please feel free to contact us or the claims administrator at 1-877-600-6533 with any questions.

Sincerely,

  
Ira M. Press

cc: Clerk of the Court, United States District Court, Southern District of New York,  
Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY  
10007-1312, *In re Citigroup Inc. Securities Litigation*, Case No. 07-civ-9901

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